

litigation, including class actions, mass actions and multi-district litigation. I am authorized to submit this declaration (the “**Declaration**”) in support of the *Debtors’ Response to Statement of Special Counsel to Official Committee of Unsecured Creditors Regarding Relief Sought by Stephanie Harris*, filed contemporaneously herewith (the “**Response**”).¹

2. In my capacity as In-House Litigation Counsel, I am generally familiar with the Debtors’ litigation matters, including the action entitled *Deutsche Bank Trust Company Americas as Trustee RAMP 2007SP3 vs. Stephanie Harris et al.*, Case No. 12-16257 CA23 filed in Miami-Dade County Circuit Court (the “**Foreclosure Action**”). Except as otherwise indicated, all statements in this Declaration are based upon my personal knowledge; information supplied or verified by personnel in departments within the Debtors’ various business units; my review of the Debtors’ litigation case files, books and records as well as other relevant documents; my discussions with other members of the Legal Department; information supplied by the Debtors’ consultants; or my opinion based upon experience, expertise, and knowledge of the Debtors’ litigation matters, financial condition and history. In making my statements based on my review of the Debtors’ litigation case files, books and records, relevant documents, and other information prepared or collected by the Debtors’ employees or consultants, I have relied upon these employees and consultants accurately recording, preparing, collecting, or verifying any such documentation and other information. If I were called to testify as a witness in this matter, I would testify competently to the facts set forth herein.

B. Background and Qualifications

3. On February 21, 2007, Movant executed a note in favor of People’s Choice Home Loan, Inc. in the amount of \$297,500.00 (the “**Note**”). The Note was secured by

¹ Capitalized terms used herein and not otherwise defined shall have the meaning ascribed to them in the Objection.

real property located at 1525 Lenox Ave., Unit 2, Miami Beach, Florida 33139 (the “**Property**”). The Note was transferred to the RAAC Series 2007-SP3 Trust, for which U.S. Bank currently is the trustee.

4. As of the Petition Date, Residential Funding Company, LLC was the master servicer of the loan, and GMAC Mortgage, LLC was the primary servicer of the loan. In connection with the Sales, the master servicing rights and primary servicing rights were transferred to Ocwen.

5. In May 2008, Movant stopped making payments on the Note. As a result, in July 2008, a foreclosure action was instituted in the Miami-Dade County Circuit Court (the “**Florida Court**”) in the name of Deutsche Bank Trust Company Americas (“**Deutsche**”). However, in December 2010, the foreclosure action was dismissed.

6. In April 2012, the Foreclosure Action was instituted in the Florida Court. The Debtors have determined that the Foreclosure Action should have been commenced in the name of U.S. Bank, as trustee for the RAAC Series 2007-SP3 Trust, and the Debtors will be taking appropriate steps to correct this error. The Foreclosure Action is pending, and Movant remains in possession of the Property.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 25, 2013

/s/ Lauren Graham Delehey
Lauren Graham Delehey
In-House Litigation Counsel for
Residential Capital, LLC